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**ATTORNEYS FOR  
FIRST STATE BANK, MESQUITE**

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

In re:	§	
	§	Case No. 09-38264-HDH
LIF ESMAEL MODABBERI,	§	
	§	(Chapter 13)
Debtor.	§	

**OBJECTION OF FIRST STATE BANK, MESQUITE  
TO DEBTOR'S PROPOSED CHAPTER 13 PLAN**

TO THE HONORABLE HARLIN D. HALE, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW First State Bank, Mesquite ("First State Bank"), a creditor and party-in-interest in the above-captioned case and plaintiff in the above-captioned bankruptcy case (the "Bankruptcy Case"), and files this its *Objection* (the "Objection") to *Debtor's Proposed Chapter 13 Plan* (the "Plan") [Docket No. 24] and in support thereof respectfully states as follows:

1. Lif Esmael Modabberi (the "Debtor") filed his bankruptcy schedules, listing First State Bank as a secured creditor in the amount of \$21,000 in his Schedule D. However, the Debtor failed to include First State Bank as a secured creditor in the Plan or any other secured creditor – other than Cadillac and Range Rover. Based on Debtor's failure to include First State Bank in his Plan, among other reasons, First State Bank objects to confirmation of the Plan. *See* 11 U.S.C. § 1325.

2. First State Bank reserves its right to amend or withdraw this Objection. This Objection does not affect any other claims First State Bank may have against the Debtor.

For these reasons, First State Bank respectfully requests that the Court deny confirmation of the Plan, and grant First State Bank any other relief to which it is justly entitled.

RESPECTFULLY SUBMITTED this 11th day of March 2010.

**MUNSCH HARDT KOPF & HARR, P.C.**

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**ATTORNEYS FOR FIRST STATE BANK,  
MESQUITE**

**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that on this the 11th day of March 2010, he caused a true and correct copy of the foregoing pleading to be served on the following party by electronic mail and through the Court's ECF system:

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